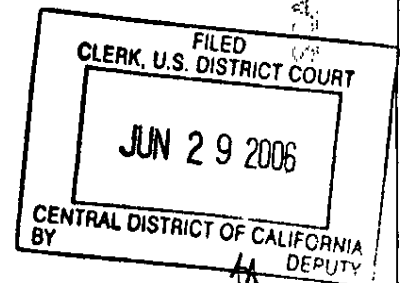


1 BUCHALTER NEMER  
A Professional Corporation  
2 BERNARD E. LESAGE (SBN 61870)  
GEOFFREY FORSYTHE BOGEAUS (SBN 60609)  
3 WILLIAM MILLER (SBN 216289)  
1000 Wilshire Boulevard, Suite 1500  
4 Los Angeles, CA 90017  
Telephone: (213) 891-0700  
5 Facsimile: (213) 896-0400

6 Attorneys for Plaintiff and Counter-Defendants,  
Southern California Housing Rights Center, dba Housing  
7 Rights Center; Danielle Jones and Gary Rhoades.



8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **HOUSING RIGHTS CENTER,**  
11 **INC.; GABRIEL ESTRADA;**  
12 **MARIA WENCE; KELVIN**  
13 **ESTRADA, a minor, by his guardian**  
14 **ad litem Maria Wence; KEVIN**  
15 **ESTRADA, a minor, by his guardian**  
16 **ad litem Maria Wence; all**  
17 **individually and on behalf of the**  
18 **GENERAL PUBLIC,**

19 **Plaintiffs,**

20 **vs.**

21 **PETE NIJJAR; NIJJAR REALTY,**  
22 **INC., dba PAMA MANAGEMENT**  
23 **CO.; PARAMJIT S. (aka PETE**  
24 **NIJJAR) AND HARJINDER K.**  
25 **NIJJAR LIFETIME TRUST; PETE**  
26 **NIJJAR individually and as trustee**  
27 **of PARAMJIT S. AND**  
28 **HARJINDER K. NIJJAR**  
**LIFETIME TRUST; TRINIDAD**  
**COLMENERO,**

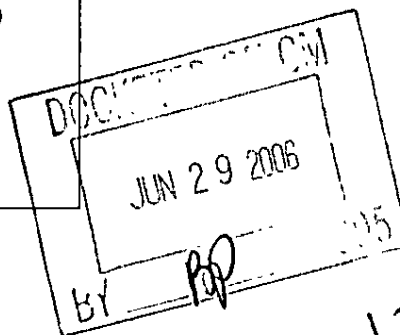
**Defendants.**

CV  
Case No. 02-9712 DSF (FMOx)

**[Assigned to the Honorable Dale S. Fischer]**

**JOINT STIPULATION AND**  
**[PROPOSED] ORDER TO**  
**CONTINUE THE EXPERT**  
**DESIGNATION DEADLINE**

Priority ☒  
Send ☒  
Enter ☐  
Closed ☐  
JS-5/JS-6 ☐  
JS-2/JS-3 ☐  
Scan Only ☐



178

1 PETE NIJJAR and NIJJAR  
2 REALTY INC.,

3 Counter-Claimants

4 vs.

5 SOUTHERN CALIFORNIA  
6 HOUSING RIGHTS CENTER INC.,  
7 aka Housing Rights Center, Inc., aka  
8 Fair Housing Council, aka San  
Gabriel Valley Fair Housing  
Council; DANIELLE JONES, and  
GARY RHOADES,

9 Counter-Defendants.  
10

11 Counter-Defendants Southern California Housing Rights Center dba Housing  
12 Rights Center (erroneously sued as "Southern California Housing Rights Center  
13 Inc." and successor in interest to Fair Housing Council of San Gabriel Valley),  
14 Danielle Jones and Gary Rhoades, and Counter-Claimants Pete Nijjar and Nijjar  
15 Realty Inc., (collectively, hereinafter the "Parties") by and through their respective  
16 counsel of record, seek a continuance of the July 1, 2006 deadline to designate  
17 expert witnesses in this matter.

18 WHEREAS, the Parties are currently engaged in settlement negotiations,  
19 which both Parties hope will lead to a resolution of this matter without the need for  
20 further litigation and thereby render the designation of experts unnecessary;

21 WHEREAS, discovery in this matter is still ongoing, and the Parties have  
22 various disputes regarding the documents that must be exchanged in this case, some  
23 of which are essential to the Parties' experts compiling their respective reports;

24 WHEREAS, the expert designation deadline and discovery cut-off in this  
25 matter are inconsistent; although discovery does not close for more than a month,  
26 at present, on July 1, 2006 the experts are required produce reports that rely on, at  
27 least in part, the documents and information obtained in discovery. The Parties,  
28

1 however, have not completed all of the discovery necessary for the experts to finish  
2 their reports. The Parties expect that all the discovery necessary for the experts to  
3 complete their reports will be done by the discovery cut-off on August 1, 2006  
4 (which is more than four (4) months before trial). Accordingly, the deadline to  
5 disclose expert witnesses should be continued until the discovery cut-off on August  
6 1, 2006.

7 WHEREAS, the Parties have agreed that in consideration of the discovery  
8 that must be completed and their ongoing settlement negotiations, the expert  
9 designation deadline should be continued to coincide with the August 1, 2006  
10 discovery cut-off; and

11 WHEREAS, good cause exists for the requested change to the current  
12 deadline for the reasons set forth herein.

13 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to  
14 the Court's approval, that the current expert designation deadline set for July 1,  
15 2006 be continued until August 1, 2006 to allow the Parties' time to complete their  
16 settlement negotiations, attempt to obtain all of the documents and information  
17 necessary for the experts to give complete reports, and make the deadline to  
18 disclose expert witnesses consistent with the discovery cut-off in this matter.

19  
20 ///

21  
22 ///

23  
24 ///

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26  
27 ///

27  
1 DATED: June 26, 2006

BUCHALTER NEMER  
A Professional Corporation

By: 

GEORGEY FORSYTHE BOGEAUS  
Attorneys for Counter-Defendants,  
SOUTHERN CALIFORNIA  
HOUSING RIGHTS CENTER, dba  
HOUSING RIGHTS CENTER;  
DANIELLE JONES and GARY  
RHOADES

9 DATED: June 27, 2006

DEMPSEY & JOHNSON P.C

By: 

ARLENE TURINCHEK  
Attorneys for Counter-Claimants,  
PETE NIJAR, NIJAR REALTY INC.

**ORDER**

Based on the stipulation of the parties, and good cause appearing therefor, IT  
IS HEREBY ORDERED that the July 1, 2006 deadline to designate experts in the  
above entitled matter be continued until August 1, 2006.

DATED: June 29, 2006

  
UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is at BUCHALTER NEMER, A Professional Corporation, 1000 Wilshire Boulevard, Suite 1500, Los Angeles, California 90017-2457.

On the date set forth below, I served the foregoing document described as:

**JOINT STIPULATION AND [PROPOSED] ORDER TO COINTINUE THE EXPERT DESIGNATION DEADLINE**

on all other parties and/or their attorney(s) of record to this action by faxing and/or

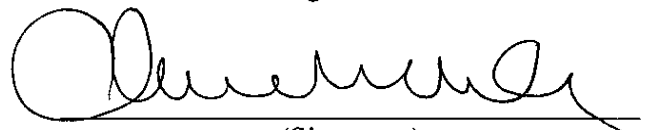
[X] placing a true copy thereof in a sealed envelope as follows:

DEMPSEY & JOHNSON  
Stephen C. Johnson, Esq.  
Rebecca Asuan-O'Brien, Esq.  
1880 Century Park East, Ste 516  
Los Angeles, CA 90067-1605

☒ **BY MAIL** I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service. The address(es) shown above is(are) the same as shown on the envelope. The envelope was placed for deposit in the United States Postal Service at Buchalter Nemer in Los Angeles, California on June 27, 2006. The envelope was sealed and placed for collection and mailing with first-class prepaid postage on this date following ordinary business practices.

☒ I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. Executed on June 27, 2006, at Los Angeles, California.

Christine Acosta

  
(Signature)